UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WISCONSIN

In Re: Roger Bradley

Case No 15-22537-BEH

Debtor.

Chapter 13

AMENDED NOTICE OF MOTION FOR RELIEF FROM THE ORDER DISMISSING DEBTOR'S CHAPTER 13 BECAUSE DEBTOR WAS NOT IN DEFAULT ON PAYMENTS

Debtor, by her attorney, William H. Green, has filed papers with the Court to for relief from the order dismissing the debtor's Chapter 13 case.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief requested, or if you want the Court to consider your views on the motion, then on or before December 23, 2015, you or your attorney must file a written objection to the motion. It must be filed with the Clerk of the United States Bankruptcy Court at the address below:

Clerk of Bankruptcy Court attn. Janet Medlock 517 E. Wisconsin Avenue Milwaukee, WI 53202

If you mail your objection to the court for filing, you must mail it early enough so that court will *receive* it within the 14-day period.

You must also mail a copy to:

William H. Green 2230 S. 108th Street, 1st floor West Allis, WI 53227 414-763-7266 phone 414-546-2990 fax willbky4545@gmail.com

If you or your attorney do not take these steps, the Court may decided that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Dated this 8th day of December, 2015

Attorney for the Debtor,

/s/William H. Green

SBN 1001678

2230 S. 108th Street, 1st floor

West Allis, WI 53227

414-763-7266 phone

414-546-2990 fax

willbky4545@gmail.com

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WISCONSIN

In Re: Roger Bradley

Case No 15-22537-BEH

Debtor.

Chapter 13

MOTION FOR RELIEF FROM THE ORDER DISMISSING DEBTOR'S CHAPTER 13 UNDER FRCP 60 BECAUSE DEBTOR WAS NOT IN DEFAULT ON PAYMENTS AND WAS IN COMPLIANCE WITH APPLICABLE COURT ORDERS

The debtor, by her attorney, William H. Green, does bring this motion for relief from the order dismissing case under Rule 60 of The Federal Rules of Civil Procedure based on the following:

- 1. The Chapter 13 Trustee brought a motion to, and said motion was resolved by order of the Court.
- 2. The debtor did Amendments that resolved issues brought before the court making an objection to The IRS claim not necessary.
- 3. The debtor did file his tax returns, and while The IRS did not amend its claim, The Wisconsin Department of Revenue did amend theirs indicating that all tax returns had been filed.
- 4. This is de-facto evidence that all returns had in fact been filed.
- 5. The debtor was able to file an amended feasible plan that paid all priority claims, whether assessed or not.
- 6. Due to this set of facts the debtor should be granted relief from the order dismissing this case.

WHEREFORE The debtor prays to this court for relief from the order dismissing this case.

Miller

Dated this 8th day of December, 2015

Attorney for the debtor

/s/William H. Green

2230 S. 108th Street, 1st floor

West Allis, WI 53227

414-763-7266 phone

414-546-2990 fax

willbky4545@gmail.com

United States Bankruptcy Court Eastern District of Wisconsin

In re	Roger Bradley		Case No.	15-22537	
		Debtor(s)	Chapter	13	

CERTIFICATE OF SERVICE

I hereby certify that on <u>December 10, 2015</u>, a copy of ___ was served by regular United States mail to all interested parties, the Trustee and all creditors listed below.

Account Recovery Services			
Accounts Receivable Management Inc			
Advance America #661			
Advance America #661			
Ally Financial			
AT&T Telephone-Bankruptcy Dept			
Aurora Health Care Metro			
Aurora Medical Group			
benesight			
Capital One Bankruptcy Dept			
cbe group			
CCB Credit Services			
Central Collections			
Check N Go			
City of Milwaukee Violations Bureau			
collection associates			
delta dental plan			
Dental Arts Associates			
Dental Arts Associates			
Dickinson Financial, LLC			
Direct TV			
elmbrook oral & maxillofacial			
fcnb/mastertrust			
Financial Control Services			
Ford Motor Credit			
ford motor credit co			
Froedtert Health			
GE Money Bank			
gmac			
hollander law offices, IIc			
Home Care Medical Inc			
HSBC Bank			
lowa co circuit court			
IRS-Insolvency			
MED HEALTH FINANCIAL SRV			
medical college of wisconsin			
Milwaukee County Circuit			
NCO Financial			
NY City dept of finance			
omni c/o ccs			
paul cotey, dds			
Professional Account Management LLC			
professional acct management			
progressive insurance			
Schelble Law Firm, SC			
Schelble Law Firm, SC			
Southwest Credit System, LP			
state collections			
Tate & Kirlin Associates			

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transworld systems inc		
trugreen chemlawn		
US Bank		
US Bank		
Wauwatosa Dental Group		
WE Energies		
wilfred e. briesemeister , esq		
Wisconisn department of Revenue		
Wisconsin Electric Power Co.		
xm satellite radio		

/s/ Dana C. Norton
Dana C. Norton
Paralegal
Will Green Law Offices
2230 S. 108th Street 2230 S. 108th Street West Allis, WI 53227 414-763-7266Fax:414-546-2990 willbky4545@gmail.com

abel Matrix for local noticing AT&T Telephone-Bankruptcy Dept Account Recovery Services 757-2 P.O. Box 769 3031 N. 114th Street lase 15-22537-beh Arlington, TX 76004-0769 Milwaukee, WI 53222-4218 astern District of Wisconsin lilwaukee 'hu Dec 10 09:46:18 CST 2015 ccounts Receivable Management Inc Advance America #661 Ally Financial '.O. Box 129 8066 N. 76th Street P.O. Box 380901 'horofare, NJ 08086-0129 Milwaukee, WI 53223-3202 Bloomington, MN 55438-0901 urora Health Care Metro Aurora Medical Group CCB Credit Services .O. Box 341100 P.O. Box 341457 P.O. Box 272 lilwaukee, WI 53234-1100 Milwaukee, WI 53234-1457 Springfield, IL 62705-0272 'apital One Bank (USA), N.A. (p) CAPITAL ONE Central Collections 'O Box 71083 PO BOX 30285 10701 W. North Ave. harlotte, NC 28272-1083 SALT LAKE CITY UT 84130-0285 Milwaukee, WI 53226-2314 heck N Go City of Milwaukee Violations Bureau Dental Arts Associates 847 N. 76th Street P.O. Box 346 11600 W. North Ave Milwaukee, WI 53201-0346 lilwaukee, WI 53218-3826 Wauwatosa, WI 53226-2146 ickinson Financial, LLC (p) DIRECTV LLC Financial Control Services :/O Messerli & Kramer, PA ATTN BANKRUPTCIES N114 W19225 Clinton Dr. 1033 Campus Dr., Ste 250 PO BOX 6550 Germantown, WI 53022-3015 'lymouth, MN 55441-2662 GREENWOOD VILLAGE CO 80155-6550 'ord Motor Credit Ford Motor Credit Company LLC Froedtert Health 1.0. Box 64400 c/o Schelble Law Firm SC 9200 W. Wisconsin Ave. Colorado Springs, CO 80962-4400 622 N Water St, Suite 400 Milwaukee, WI 53226-3596 Milwaukee WI 53202-4909 Home Care Medical Inc E Money Bank HSBC Bank 1.0. Box 981469 P.O. Box 5253 Drawer 828 11 Paso, TX 79998-1469 Carol Stream, IL 60197-5253 Milwaukee, WI 53278-0828 p) INTERNAL REVENUE SERVICE Iowa co circuit court MED HEALTH FINANCIAL SRV ENTRALIZED INSOLVENCY OPERATIONS 222 n. Iowa Street , ste 205 PO BOX 1996 O BOX 7346 Dodgeville, WI 53533-1557 Milwaukee, WI 53201-1996 HILADELPHIA PA 19101-7346

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NY City dept of finance

Harrisburg, PA 17108-0988

c/o penn credit corp

po box 988

NCO Financial

PO BOX 15636

Wilmington, DE 19850-5636

lilwaukee County Circuit

01 N 9th Street STE 104

lilwaukee, WI 53233-1425

Office of the U. S. Trustee 17 East Wisconsin Ave. toom 430 lilwaukee, WI 53202-4510

Professional Account Management LLC P.O. Box 2080 Milwaukee, WI 53201-2080 Schelble Law Firm, SC 622 North Water Street, Ste 400 Milwaukee, WI 53202-4909

Southwest Credit System, LP 1910 W. Plano Pkwy Suite 100 Plano, TX 75093-2202 TCF National Bank 800 Burr Ride PKWY Willowbrook, IL 60527-0865 TCF National Bank P.O. Box 170995 Milwaukee, WI 53217-8096

'ate & Kirlin Associates 1810 South Hampton Rd 'hiladelphia, PA 19154-1207

Time Warner Cable P.O. Box 3237 Milwaukee, WI 53201-3237 TransWorld Systems 507 Prudential Rd. Horsham, PA 19044-2308

p) US BANK O BOX 5229 :INCINNATI OH 45201-5229 WE Energies 231 W. Michigan St. Milwaukee, WI 53203-2918

Wauwatosa Dental Group 2600 N. Mayfair Rd. Milwaukee, WI 53226-1364

le Energies Attn Bankruptcy Dept. RM A130 133 W Everett St Hilwaukee WI 53290-0002 Wisconisn department of Revenue 819 N 6th Street Rm 408 Milwaukee, WI 53203-1606

Wisconsin Department of Revenue Attn: Special Procedures, MS 4-SPU PO BOX 8901 Madison WI 53708-8901

Misconsin Electric Power Co. 31 W. Michigan Street Noom A172 Milwaukee, WI 53290-0003

benesight po box 395 Pueblo, CO 81002 cbe group paymennt processing po box 2068 Waterloo, IA 50704-2068

collection associates 25 s. executive dr brookfield, WI 53005-4257

delta dental plan po box 15965 Little Rock, AR 72231-5965 elmbrook oral & maxillofacial 12720 north avenue Brookfield, WI 53005-4623

icnb/mastertrust
.620 dodge street
:top #3103
maha, NE 68102-1593

ford motor credit co po box 88306 Chicago, IL 60680-1306 gmac po box 217060 Auburn Hills, MI 48321

ollander law offices, llc to box 105130 tlanta, GA 30348-5130 medical college of wisconsin physicians & clinics po box 13308 Milwaukee, WI 53213-0308 omni c/o ccs payment processing center po box 55126 Boston, MA 02205-5126

aul cotey, dds .0701 north ave lilwaukee, WI 53226-2314 professional acct management 2040 w. wisconsin ave Milwaukee, WI 53233-2098 progressive insurance po box 7247-0112 re:artisan &truckers cas Philadelphia, PA 19170-0001 tate collections to box 6250 ladison, WI 53716-0250 transworld systems inc 2675 n mayfair rd #504 Milwaukee, WI 53226-1305

trugreen chemlawn n8 w22550 johnson dr Waukesha, WI 53186-1661

rilfred e. briesemeister , esq 050 pali verde , ste 113 lontclair, CA 91763-2333 xm satellite radio po box 9001399 Louisville, KY 40290-1399 Mary B. Grossman Chapter 13 Trustee P.O. Box 510920 Milwaukee, WI 53203-0161

'amela Bradley :102 N 39th Street lilwaukee, WI 53216-1643 Roger Bradley 4102 N 39th Street Milwaukee, WI 53216-1643

William H. Green
Will Green Law Offices
2230 S. 108th Street
1st Floor
West Allis, WI 53227-1168

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

lapital One Bankruptcy Dept
'.O. Box 5155
lorcross, GA 30091

Direct TV P.O. Box 78626 Phoenix, AZ 85062-8626 IRS-Insolvency 211 w. wisconsin ave Milwaukee, WI 53202

IS Bank
7.0. Box 108
Faint Louis, MO 63166

(d) US Bank P.O. Box 1800 Saint Paul, MN 55101-0800

End of Label Matrix
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Bypassed recipients 0
Total 68